IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA **NORTHERN DIVISION**

J.B., a minor child, by and through his next friend, ADDIE WARD, on Behalf of himself and all others similarly situated;

Plaintiff,

CASE NO: 2:06cv00755-MHT VS.

> **JURY DEMANDED CLASS ACTION**

WALTER WOOD, in his individual

capacity,

Defendant.

MOTION TO FILE PLAINTIFF'S EXHIBITS TO HIS RESPONSE TO **DEFENDANT'S MOTION FOR SUMMARY JUDGMENT UNDER SEAL**

Plaintiff J.B. requests the Court to issue a Protective Order placing under seal or otherwise prohibiting the disclosure of the Plaintiff's exhibits filed with his Motion in Response to Defendant Wood's Motion for Summary Judgment.

As grounds for his motion, he would state that an Order is necessary to protect the identity of minor children committed to the Department of Youth Services.

WHEREFORE, Plaintiff requests the Court to enter an Order sealing these documents/exhibits from the public.

> /s/Robert D. Drummond, Jr. ROBERT D. DRUMMOND, JR. (DRU004) Attorney for Plaintiff

OF COUNSEL: 323 De La Mare Avenue Fairhope, Alabama 36532 (251) 990-6249

/s/Michael J. Crow MICHAEL J. CROW (CRO039) Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of July, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

T. Dudley Perry P.O. Box 66 Mt. Meigs, AL 36057

Michael Crow P.O. Box 4160 Montgomery, AL 36103-4160

Robert D. Drummond Attorney at Law 323 De LaMare Fairhope, AL 36532

> /s/Robert D. Drummond, Jr. OF COUNSEL